

Steven L. Beshear Governor

## Energy and Environment Cabinet Department for Environmental Protection

Division for Air Quality 200 Fair Oaks Lane, 1st Floor Frankfort, Kentucky 40601-1403 www.air.ky.gov Leonard K. Peters Secretary

March 9, 2009

Mr. Richard Schutt, Chief Air Planning Branch U.S. EPA, Region 4 Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Atlanta, Georgia 30303-8960

Dear Mr. Schutt:

The purpose of this letter is to provide the U.S. EPA with a technical amendment to the June 25, 2008, Kentucky Regional Haze State Implementation Plan (SIP) submittal. This amendment identifies in the Kentucky Regional Haze SIP the appropriate BART Title V permit emission limits for E.ON U.S. Mill Creek Units 3 and 4.

The June 25, 2008, Kentucky Regional Haze SIP submittal inadvertently indicated that the BART Title V permit emission limits for E.ON Mill Creek Units 3 and 4 to be 0.015 lb/mmBtu for SO<sub>3</sub>. However, the Division, in consultation with E.ON, has determined that the proper BART Title V permit emission limits for E.ON Mill Creek Units 3 and 4 are H<sub>2</sub>SO<sub>4</sub> emission rates of 64.3 lb/hr and 76.5 lb/hr respectively given that these emission rates were utilized in the September 24, 2007, Mill Creek BART determination modeling (*Please see pages 182 and 183 of Appendix L.11 of the June 25, 2008, Kentucky Regional Haze SIP submittal*). Although it is the case that the aforementioned lb/hr emission rates when divided by the maximum design capacity for Mill Creek Unit 3 (4,204 mmBtu/hr) and Mill Creek Unit 4 (5,025 mmBtu/hr) is equivalent to 0.015 lb/mmBtu, the appropriate BART Title V permit emission limits that should be reflected in the Kentucky Regional Haze SIP for E.ON Mill Creek Units 3 and 4 are the above lb/hr H<sub>2</sub>SO<sub>4</sub> emission rates that were modeled for the BART sorbent injection controls.

Since the aforementioned H<sub>2</sub>SO<sub>4</sub> emission rates were included and documented in the June 25, 2008, Kentucky Regional Haze SIP submittal, the Division does not consider it necessary to conduct another public hearing in order to make this SIP technical amendment. Enclosed in hard copy are only the June 25, 2008, Kentucky Regional Haze SIP documents that contain the few pages that have been amended with the proper BART Title V permit emission limits for E.ON Mill Creek Units 3 and 4.



Mr. Richard Schutt Letter March 9, 2009 Page 2 of 2

The amended June 25, 2008, Kentucky Regional Haze SIP documents and all other Kentucky Regional Haze SIP information as submitted on June 25, 2008, are contained on the enclosed DVDs for the U.S. EPA review and final SIP approval. The same SIP information is also available at the following Division link at: ftp://kydaqusr:Aqua\_222@kyftp01.ky.gov/. If you have any questions regarding this matter, please contact Mr. Martin Luther, of my staff, at martin.luther@ky.gov or 502-564-3999.

Sincerel &

John S. Lyon Director

JSL:mrl

c: Mohammad Madjdinasab, EPA Region 4